

Intelidata Technologies Corporation (Former CEE Associates)

Briefing Memo for CA 400 and 550 Determinations

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Facility Description:

The former CEE Associates facility, located at 80 Pickett District Rd. in New Milford, CT consists of an approximately 8-acre parcel on which a single-story building is located. The majority of the site is covered by the building and paved parking areas are located on the northern and southern ends of the building.

Surrounding Land Use:

The land surrounding the site is a mixture of residential and industrial/commercial. A large Kimberly Clark facility, manufacturer of paper products, abuts the facility to the north. Neeltran, Inc, which designs and manufactures power supplies and transformers, abuts the site to the east. The property is located in an area classified as GB under the Connecticut Department of Environmental Protection (CT DEP). All properties downgradient of the site are served by public water.

Environmental Setting:

The nearest surface water body is the Housatonic River, which is located approximately 800 feet to the east of the site. USGS maps identify the overburden as glacial outwash deposits consisting of sand, silt, and gravel overlying glacial till. Groundwater is present in the overburden across the site, with the exception of the upgradient portion of the site dominated by shallow bedrock features. Groundwater flow direction is generally to the east with discharge to the Housatonic.

Facility History:

The site was undeveloped prior to 1963, when the current site building was constructed. From 1964 until 1983, the property was owned and occupied by the Burndy Corporation, which had a metal plating operation and operated a RCRA-regulated surface impoundment as part of its wastewater treatment system. In 1983, the property was purchased by CEE Associates, LLC. A number of tenants occupied the property under their ownership. Diventco Corporation had an electroplating and dry film processing operation from 1983 until 1993. Colonial Data Services Corporation, a telephone equipment repair service, operated during the same time period. IntelliData Technologies Corporation used the property for warehousing, assembly, and distribution of electronic communication products from 1996 until 1999. On January 6, 2000, the property was transferred from CEE Associates LLC / Intelidata to the Edelman Limited Partnership. CEE was the certifying party on the Form III filing that accompanied the transfer under the CT Property Transfer Act.

Waste Management History:

Between 1967 and 1982, Burndy Corp. disposed of metal hydroxide sludges from their plating waste water treatment system on-site in two unlined sludge drying beds located along the southern site boundary. Treated wastewater was pumped into an unlined

wastewater lagoon, then pumped from the lagoon and discharged to the Housatonic under NPDES permit (#0001546). The RCRA-regulated surface sludge drying beds and wastewater lagoon were closed by removal in 1983 in accordance with a CT DEP-approved closure plan approved by CT DEP on August 26, 1983.

Diventco Corporation generated and treated wastewater at the site. Metal hydroxide sludges were hauled off-site to a licensed disposal facility and treated wastewaters were discharged to the Housatonic River under a NPDES permit (#0002607) from 1983 to 1993.

Operational and sanitary wastewaters, since 1993, have been discharged to an on-site septic system.

Fuel Oil (#2) was stored in a 10,000 gallon UST located immediately east of the southeast corner of the facility building. The tank was removed in 1986 when the facility started using natural gas/propane. The local fire department, who oversaw the tank removal, certified that the grave was clean.

Between 1966 and 1990, 1,1,1-trichloroethane was used as a degreasing/cleaning agent by Burndy and Diventco. Virgin and spent 1,1,1-TCA were stored in drums staged in the hazardous waste storage room located in the southwestern portion of the facility. Both Burndy and Diventco also generated waste oil, which was also collected in drums and stored in hazardous waste storage room.

Status of Investigation and Remediation:

CVOCs in Soil and Groundwater (AOCs 4, 5, 7,9)

Chlorinated volatile organic compounds (CVOCs), including trichloroethene, 1,1-dichloroethane, cis-1,2-dichloroethene, tetrachloroethene, and 1,1,1-trichloroethane, have been detected in groundwater above regulatory criteria. These constituents are suspected to have resulted from releases associated with the former hazardous waste storage area (AOC-4), former plating area (AOC-5), and a stormwater vault (AOC 9). Soil removal was performed in the hazardous waste storage area in 2002 to remove soil contaminated with CVOCs and waste oil. TPH- and PCE- contaminated soil was left in place below the water table in this location. CVOCs released to overburden groundwater are controlled by a curtain of air sparging wells located at the eastern property boundary, part of a soil vapor extraction/ air sparge system (SVE/AS) operating at the site since February 2006 to treat CVOCs in soil and groundwater.

Due to previous detections of 1,1-dichloroethene in excess of the Connecticut Remediation Standard Regulation (RSR) Surface Water Protection Criteria (SWPC) in on-site open borehole bedrock wells BR-3 and BR-5, evaluation of groundwater flow in bedrock was performed in 2007 and 2008. Results of this evaluation showed limited transmissivity in competent bedrock. Waterloo profile results from along the eastern facility boundary showed that, except in the vicinity

of the active "sparge wall" near ERM-11, which likely imparts turbulence to the system, the distribution of VOCs was limited to a thin (approximately 1 foot thick) layer at the weathered bedrock interface. These findings were confirmed by off-site investigations conducted in 2008 to assess the distribution of VOCs off-site. These investigations included surface geophysics to identify the topography of the bedrock surface, and Waterloo Profiling to assess the vertical and horizontal distribution of VOCs in the overburden aquifer on the down-gradient properties. A nested well pair installed downgradient of the site at the water table and the bedrock surface, near the Housatonic River, showed levels of CVOCs below the CT RSR Surface Water Protection Criteria (SWPC). However TCE was detected at 59.6 ug/L at the bedrock surface, below the proposed CT Water Quality Criterion of 34.3 ug/L multiplied by a 10-fold dilution factor = 343 ug/L. It is expected that these levels will continue to decrease with continued operation of the SVE/AS system. The SVE/AS system is expected to continue operation through 2010. In addition to monthly monitoring soil vapor at extraction wells, semi-annual groundwater monitoring will be performed at four on-site groundwater monitoring wells, plus the two off-site nested wells. When levels meet CT RSR criteria, the facility plans to switch to a quarterly monitoring frequency to assess compliance with CT RSRs.

Metal Hydroxide Sludge Drying Beds (AOC 3) and Wastewater Lagoon (AOC 2)

As noted above, these units were closed by removal in the 1980s and backfilled with clean fill to a depth of 6 feet. Therefore, surface soil contamination is not expected. Results of 1998 and 1999 soil samples collected beneath the former footprints of these units and analyzed for metals, cyanide and VOCs have shown residual soil to be in compliance with the CT RSRs. VOCs detected in groundwater in these areas are likely associated with the site-wide groundwater plume.

Septic System (AOC 1)

Soil and groundwater sampling have been performed in and around this AOC. Soil samples analyzed for metals, VOCs, and cyanide found all in compliance with the RSRs. Releases to surface soils would not be expected from this system. Groundwater samples detected CVOCs associated with the site-wide plume described above.

#2 Fuel Oil Tank (AOC 6)

No records of a release exist. No TPH or petroleum related VOCs have been detected in groundwater samples from a monitoring well downgradient of this location. No releases to surface soil are expected to have occurred.

CLP-owned Transformer (AOC 8)

The transformer, labeled as PCB content < 50 ppm, is located in an enclosure attached to the southwest corner of the building. In 2001, after failure to obtain access from CLP, collected 4 surface soil samples (0-6" depth) analyzed for PCBs from just outside the fence. The sample collected from the north side of the

transformer detected 1,300 ug/kg PCBs (1254). ADDITIONAL WORK TO CHARACTERIZE LATERAL AND VERTICAL EXTENT OF PCBs IN SOIL AND EVALUATE PRESENCE OF TPH IN SOIL AND GROUNDWATER AND PCBs IN GROUNDWATER WAS RECOMMENDED IN JUNE 2002 SUMMARY REPORT AND PHASE II WORK PLAN. DOCUMENTATION OF THIS WORK COULD NOT BE FOUND IN EPA FILE.

Loading Docks (AOC 9)

Three loading docks exist at the Facility: two on the south side and one on the north side of the building. Stormwater collected from the two loading docks on the south side is diverted to drywell VT-1. The loading dock on the north side is served by a drywell in the loading dock itself. Samples collected below loading docks and in drywells were analyzed for VOCs, metals, and TPH. The sample from VT-1 contained TPH > RSR criteria. ADDITIONAL WORK TO ASSESS PRESENCE OF CYANIDE, TPH, AND VOCs IN SOILS AROUND VT-1 WAS RECOMMENDED IN JUNE 2002 SUMMARY REPORT. ACCORDING TO A 1/19/2004 LETTER FROM ERM, ADDITIONAL SAMPLES COLLECTED AROUND VT-1 DID NOT CONTAIN TPH ABOVE REGULATORY LEVELS. ERM'S STATED APPROACH WAS TO PLACE A SITE-WIDE ELUR TO LIMIT SITE USE TO INDUSTRIAL/COMMERCIAL ACTIVITIES. HOWEVER, THE INITIAL SAMPLE EXCEEDED I/C DEC AND GB PMC.

Wastewater Transfer Pipelines (AOC 10)

Two former wastewater transfer pipeline trenches are located on the south side of the property. These were used to transport materials to the former wastewater lagoon and the former sludge drying beds. 24 samples collected along the footprint of these pipelines analyzed for TPH, VOCs, cyanide and metals detected no constituents above RSRs. No constituents exceeded CT RSR criteria. No releases to surface soil are expected to have occurred from this AOC.

Proposal for Site-Wide Remedy Decision (CA 400) and Construction Complete (CA 550) Determination

CEE/InteliData public noticed a Remedial Action Plan (RAP) in accordance with CT DEP requirements in 2001. Therefore, the CA 400/550 effective date could be the date that the Ecological Receptor Exposure Pathway Scoping Checklist is signed.

ELURs are proposed for the following: 1) to limit the property to industrial/commercial use; and 2) to prevent disturbance of subsurface soil in the former Hazardous Waste Storage where TPH- and PCE- contaminated soil was left below the water table.

Due to the relatively short expected time-frame for continued operation of the SVE/AS system, a stewardship agreement is not expected to be necessary.

What sort of determination will be necessary to close the RCRA regulated units?
RCRAInfo lists four regulated units with the following status:

Unit Description	Effective Date	Status
Disposal Impoundment	11/9/85	LOSS OF INTERIM STATUS - INACTIVE/CLOSING, BUT NOT YET RCRA CLOSED
Storage Impoundment	11/9/1980	LOSS OF INTERIM STATUS - INACTIVE/CLOSING, BUT NOT YET RCRA CLOSED
Tank Treatment	11/20/1980	NEVER REGULATED AS A TSD - PROTECTIVE FILER
Storage Container	5/17/1984	NEVER REGULATED AS A TSD - PROTECTIVE FILER

Operation and Maintenance

The SVE/AS system is expected to continue operation through at least the next two years. Concentrations of PCE in soil vapor have recently been rising, indicating that residual soil-borne source of this contaminant remains. Based on this trend, an additional SVE extraction point will be considered for installation under the southwest corner of the building following additional investigation. In addition to monthly monitoring of seven soil vapor at extraction wells, semi-annual groundwater monitoring will be performed at four on-site groundwater monitoring wells and the two nested wells located off-site adjacent to the Housatonic River. Monitoring is performed under a Quality Assurance Project Plan which was reviewed by EPA and revised based on EPA comments. Minor modifications are needed before the QAPP can be approved.

